## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

PROMESA
Title III
Case No. 17 BK 3283-LTS (Jointly Administered)

# MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL MONITOR, LLC AT HEARING SCHEDULED FOR JUNE 28, 2019

## TO THE HONORABLE COURT:

**COMES NOW**, Cantor-Katz Collateral Monitor, LLC (the "<u>Collateral Monitor</u>"), by and through its undersigned counsel, hereby submits this motion to inform in compliance with this Honorable Court's *Hearing Procedures Order* [Dkt. No. 7524], and respectfully states as follows:

1. Douglas S. Mintz and Peter J. Amend, of Orrick, Herrington & Sutcliffe LLP, will appear in person on behalf of the Collateral Monitor at the Hearing (as defined in the Hearing Procedures Order) on June 28, 2019 in Courtroom 17C at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007. Mr. Mintz and/or Mr. Amend may present argument with respect to the following:

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

- a. Amended Motion of (I) Financial Oversight and Management Board, Acting
  Through its Special Claims Committee, and (II) Official Committee of Unsecured
  Creditors, under Bankruptcy Code Sections 105(A) and 502 and Bankruptcy Rule
  3007, to (A) Extend Deadlines and (B) Establish Revised Procedures with Respect
  to Omnibus Objections to Claims of Holders of Certain Commonwealth General
  Obligation Bonds Issued in 2011, 20912 and 2014, and for Related Relief
  Requested. (Docket 7154)
- b. Limited Objection and Reservation of Rights of the DRA Parties to the Amended Motion of (I) Financial Oversight and Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, under Bankruptcy Code Sections 105(A) and 502 and Bankruptcy Rule 3007, to (A) Extend Deadlines and (B) Establish Revised Procedures with Respect to Omnibus Objections to Claims of Holders of Certain Commonwealth General Obligation Bonds Issued in 2011, 20912 and 2014, and for Related Relief Requested. (Docket 7492)
- 2. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. will attend the hearing and be seated at in the San Juan courtroom.
- 3. The Collateral Monitor reserves the right to respond, as necessary, to any statements made at the Hearing or otherwise by any party in connection with the above-captioned Title III case.

WHEREFORE, for the foregoing reasons, the Collateral Monitor respectfully requests that this Honorable Court take notice of its compliance with the Hearing Procedures Order.

#### RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of June 2019.

WE HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

/s/Carmen D. Conde Torres
Carmen D. Conde Torres, Esq.
USDC 207312

/s/Luisa S. Valle Castro Luisa S. Valle Castro, Esq. USDC No. 215611

## C. CONDE & ASSOC.

254 San José Street, 5<sup>th</sup> Floor Old San Juan, Puerto Rico 00901 Telephone: 787-729-2900;

Facsimile: 787-729-2203

E-mail:condecarmen@condelaw.com

Counsel for Cantor-Katz Collateral Monitor, LLC

/s/ Douglas S. Mintz
Douglas S. Mintz, Esq.
(admitted pro hac vice)

/s/ Peter J. Amend Peter J. Amend, Esq. (admitted pro hace vice)

## ORRICK, HERRINGTON & SUTCLIFFE LLP

Columbia Center 1152 15<sup>th</sup> Street, N.W. Washington, D.C. 20005-1706 Telephone: (202) 339-8400 Facsimile: (202) 339-8500

Counsel for Cantor-Katz Collateral Monitor LLC,